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Honorable Judge Samuel J. Steiner
DATE: November 12th, 2010
TIME: 9:30 a.m.
Chapter 11
LOCATION: Seattle
RESPONSE DUE: Wednesday, Nov. 10, 2010

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re: Adam R. Grossman, Debtor.	CHAPTER 11 BANKRUPTCY CASE NO. 10-19817-SJS DEBTOR'S APPLICATION FOR AUTHORITY TO EMPLOY FAMILY LAW ATTORNEY AS DEBTOR'S SPECIAL COUNSEL NUNC PRO TUNC

COMES NOW Adam R. Grossman, the Debtor-In-Possession ("Debtor") herein, and respectfully represents the following:

1. The undersigned Debtor came into being with the filing of the Chapter 11 Petition on August 19, 2010.

2. Your applicant requires the assistance of state court family law counsel so as to enable him to protect the assets of the estate. Retention of a state court family law attorney

is necessary in connection with the following non-exhaustive list of matters:

(a) protecting and preserving the assets of the estate for the Debtor;

(b) issues surrounding the complex division of property;

(c) issues surrounding the division and valuation of business assets;

(d) obtaining and defending requests for spousal maintenance;

(e) obtaining and defending requests for alimony;

(f) assistance regarding the calculation of income, deviation of child support, child support payments, and child support enforcement; and

(g) issues surrounding the division and valuation of retirement or investment accounts.

Your applicant believes that these are vital and necessary services in order to protect the assets of the estate.

3. The Debtor has conferred with, and now desires to retain and employ, the Tsai Law Company, PLLC as his state court family law attorneys at the rate of $295.00 per hour for attorney's fees or $3,500.00 per day during trial under a general retainer to perform the above-described services necessary and desirable in the administration and reorganization of this estate.

4. The Debtor has selected said firm because of the experience and knowledge of the Tsai Law Company, PLLC in the field of preservation of the assets of family law litigants. Accordingly, the Debtor believes that the Tsai Law Company, PLLC is well qualified to represent him in Debtor's state court family law case.

5. On September 16, 2010, $7,500.00 was paid by Peter Hendrickson to the Tsai Law Company, PLLC on Applicant's behalf.

6. On October 11, 2010, $20,000.00 was paid by Lyman Opie to the Tsai Law

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Company, PLLC on Applicant's behalf.

7. Neither of these two payments were made with any strings attached.

8. Your Applicant paid the amount of $5,000.00 by cashier's check on September 25, 2010 to the Tsai Law Company, PLLC.

9. The $5,000.00 paid directly to the Tsai Law Company, PLLC by your applicant (the $5,000.00) was returned to your Applicant by the Tsai Law Company, PLLC on October 22, 2010. These funds were paid by check to your Applicant out of the Tsai Law Company, PLLC's IOLTA account.

10. Debtor has given the Tsai Law Company, PLLC Debtor's informed consent (under Rules of Professional Conduct 1.8(f)) to the payments by third parties of the Tsai Law Company, PLLC's fees.

11. In other words, no assets of the estate have been used for employment of the Tsai Law Company, PLLC.

12. It is necessary and essential that the Debtor employ the Tsai Law Company, PLLC under a general retainer based on time and billable charges. A general retainer is necessary because of the extensive legal services required for Debtor's state court family law litigation.

13. The firm of the Tsai Law Company, PLLC has indicated its willingness to act on the Debtor's behalf and to be compensated in accordance with the terms and conditions set forth in paragraph 3 above.

14. To the best of applicant's knowledge, the members and associates of the firm of the Tsai Law Company, PLLC do not have any connection with the Debtor, his creditors, or any other party in interest, or their respective attorneys or accountants, and represent no

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interest adverse to the estate in the matters upon which it is to be retained.

15. Further, to the best of applicant's knowledge, the two persons who supplied funds to the firm of the Tsai Law Company, PLLC on behalf of the Debtor are not creditors of the Debtor nor are they in a business relationship (i.e., not an investor, partner, officer, affiliate) with the Debtor, his creditors, or any other party in interest, or Debtor's respective attorneys or accountants, and the two persons who supplied funds do not represent an interest adverse to the interest of the estate.

16. There were exceptional circumstances surrounding the Applicant's engagement of the Tsai Law Company, PLLC.

17. Your applicant is in the midst of dissolution proceeding in King County Superior Court. The case no. is 09-2-02955-9. This action was filed by the Applicant's spouse on April 15, 2009.

18. This dissolution proceeding has, to date, involved over 235 individual pleadings. In fact, in the month of October, 2010 by itself, there have been forty (40) docketed items alone, not including discovery requests and production. Further, some pre-trial issues are now before the State Court of Appeals (Trial Court docket line 201, filed on Sept. 28, 2010).

19. Trial is currently set for Monday, November 15, 2010.

20. The delay in seeking approval for the Tsai Law Company, PLLC to serve as Debtor's special counsel is due to the intense and time consuming nature of this dissolution proceeding.

21. The Tsai Law Company, PLLC has benefited the estate in a signicant manner.

22. The Tsai Law Company, PLLC has conducted six depositions, three hearings

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(one in person and two by phone) and also general discovery to obtain information to use to preserve the assets of Debtor's estate during trial.

WHEREFORE, applicant requests the entry of an order authorizing him to employ and retain the Tsai Law Company, PLLC, pursuant to and under a general retainer on the terms and conditions recited above, to represent him in Debtor's state court family law litigation and that said employment be authorized Nunc Pro Tunc.

DATED this 4th day of November, 2010.

/s/ Adam R. Grossman

Adam R. Grossman, Debtor

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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re: Adam R. Grossman, Debtor.	CHAPTER 11 BANKRUPTCY CASE NO. 10-19817-SJS ORDER AUTHORIZING EMPLOYMENT OF DEBTOR'S FAMILY LAW ATTORNEY AS SPECIAL COUNSEL NUNC PRO TUNC

Upon the application of Adam R. Grossman, dated November 4, 2010, for an order authorizing the Debtor-in-Possession to employ and retain the Tsai Law Company, PLLC as his Special Counsel (state court family law attorneys), and upon the Declaration of Emily Tsai, signed on November 4, 2010, and it appearing that Emily Tsai is duly admitted to practice before the King County Superior Court, and this Court being satisfied that said attorney and her firm represent no interest adverse to the estate with respect to matters upon

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which they are to be engaged, that they are “disinterested persons” under Sections 101(14) and 327 of Title 11, United States Code, that their employment is necessary and would be in the best interests of the estate, that Debtor has provided a satisfactory explanation for the failure to obtain approval in advice of employment, and that the proposed family law attorney has demonstrated service that has significantly benefited the estate, and sufficient cause appearing therefore, Now, Therefore,

IT IS HEREBY ORDERED that Adam R. Grossman, as Debtor-In-Possession, be and is hereby authorized to employ and retain the Tsai Law Company, PLLC as his attorneys at the rate of $295 per hour for attorney’s fees or $3,500 per day during trial to perform all of the services set forth in the Application, said fees to be subject to approval by the Court.

____
SAMUEL J. STEINER
U.S. Bankruptcy Judge

Presented By:

LAW OFFICE OF MATTHEW D. O’CONNER

By: /s/ Matthew D. O’Conner_______
Matthew D. O’Conner, WSBA #27061
Attorney for Debtor-in-Possession

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